

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

June 3, 2020

Via ECF

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Capser*, 19 CR 337 (JPO)

Dear Judge Oetken:

With the consent of the Government and Pretrial Services, I write to request a temporary modification of Mr. Capser's bail conditions to allow him to attend a football recruitment camp with his son in Colorado Springs, CO. Mr. Capser would leave Billings, MT on June 13, 2020, and return on June 15, 2020.

While out on bail Mr. Capser has reported regularly to Pretrial Services, and is in regular communication with my office.

Thank you for your consideration of this application.

Respectfully submitted,



Tamara L. Giwa
Counsel for Todd Capser
Federal Defenders of New York
(212) 417-8719

Cc: AUSA David Robles (via ECF)
AUSA Benjamin Schrier (via ECF)